

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

IN RE:

CASE NO.: 24-26752

Chapter 13

Michael L Lange

Nichole L Lange

Debtors

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OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

Comes now Fairway Independent Mortgage Corporation (“Creditor”), for its Objection to Confirmation of Chapter 13 Plan states:

1. Debtor filed a Chapter 13 bankruptcy proceeding and a proposed Plan of Reorganization on December 18, 2024.
2. Creditor is a secured creditor of Debtor's bankruptcy proceeding.
3. Secured Creditor filed its Proof of Claim (Claim #12) listing an arrearage of \$1085.19.
4. The Plan fails to make any provision for Secured Creditor’s arrearage claim.
5. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.
6. It is unlikely that a feasible plan can be proposed because it does not appear that the sufficient disposable income to cure the default on the mortgage within the jurisdictional limits of chapter 13. Thus, the provisions of 11 U.S.C. § 1325 (a)(6) cannot be met and the plan cannot be confirmed.
7. Creditor objects to any plan which proposes to pay it anything less than its full pre-

petition arrearage and regular monthly payment over the life of the plan.

8. Creditor reserves the right to supplement or amend this Objection to Confirmation if necessary.

WHEREFORE, Creditor respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Creditor as stated herein, and for such other and further relief as the Court deems just and proper.

Date: February 12, 2025

Respectfully submitted,

MARINOSCI LAW GROUP, P.C.
Attorney for Creditor

/s/ Michael Dimand
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CERTIFICATE OF SERVICE

I, Christopher K. Baxter, certify that a true and correct copy of the Objection to Confirmation of Plan was placed in the U. S. Mail with sufficient postage affixed hereto and via ECF/Electronic Mail, as to guarantee proper delivery to the following on this this 12th day of February, 2025.

Debtor

Michael L Lange
W6231 County Road E
Westfield, WI 53964

Trustee

Scott Lieske
P.O. Box 510920
Milwaukee, WI 53203

U.S. Trustee

U.S. Trustee
517 East Wisconsin Ave. Room 430
Milwaukee, WI 53202

Debtor's Attorney:

Noe Joseph Rincon
26 Schroeder Court, Suite 300
Madison, WI 53711

Marinosci Law Group, P.C.

/s/ Michael Dimand
Michael Dimand, Esq.